

**UNITED STATES OF AMERICA
BEFORE THE NATIONAL LABOR RELATIONS BOARD
WASHINGTON, D.C.**

JAG HEALTHCARE, INC.

and

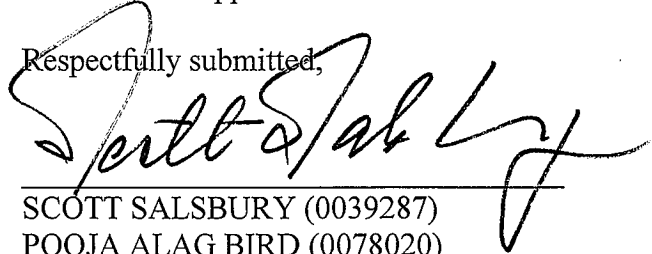
SEIU DISTRICT 1199

CASE NO. 8-CA-039029
CASE NO. 8-CA-039112
CASE NO. 8-CA-039133

**RESPONDENT JAG HEALTHCARE, INC.'S REQUEST FOR EXTENSION OF TIME
TO FILE EXCEPTIONS TO ADMINISTRATIVE LAW JUDGE'S DECISION**

Pursuant to Sec. 102.47 of the National Labor Relations Board's Rules and Regulations, Respondent JAG Healthcare, Inc. respectfully requests a short extension of time to file Exceptions to Administrative Law Judge Carter's July 27, 2012 decision. The reasons for this request are fully set forth in the attached memorandum in support.

Respectfully submitted,



SCOTT SALSBUURY (0039287)
POOJA ALAG BIRD (0078020)
SALSBUURY & SALSBUURY, LPA
75 Milford Drive, Suite 209,
Hudson, Ohio 44236
Phone: 330-655-5760
Fax: 330-655-0526
ssalsbury@salsburylaw.com
pbird@salsburylaw.com

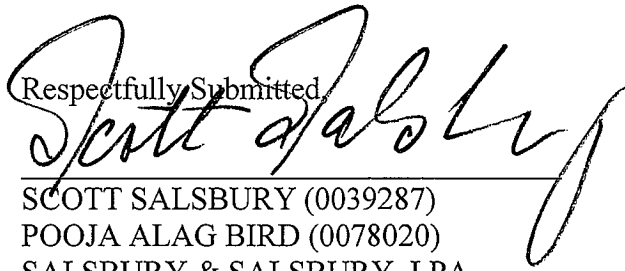
MEMORANDUM IN SUPPORT

On July 27, 2012, Administrative Law Judge Carter issued his decision in the above-captioned action in favor of the Acting General Counsel on behalf of the Union. Pursuant to Board Rule Sec. 102.46, Respondent JAG Healthcare, Inc.'s Exceptions to the Judge's Decision must be filed no later than August 24, 2012.

Counsel for Respondent will be unavailable from August 10 through August 21, 2012 due to a previously scheduled family vacation. Counsel scheduled this vacation several months ago; accommodations have already been secured, and payment submitted for Counsel's vacation is non-refundable. Counsel respectfully requests an additional twelve days, until September 5, 2012, to submit its Exceptions. Counsel's request is only equal to the time period for which Counsel will be out of the office.

The undersigned contacted the Counsel for the Acting General Counsel; he takes no position and, therefore, does not oppose this request. Further, Respondent accommodated Counsel for the Acting General Counsel's scheduling conflict when setting dates for the trial below (wedding in Tennessee). This is Respondent's first request for an extension of time. This request is not interposed to cause undue delay, and will not unfairly prejudice Counsel for the Acting General Counsel's interests.

Wherefore, for good cause, and not for the purpose of delay, Respondent respectfully requests an extension of time to file its Exceptions until September 5, 2012.

Respectfully Submitted,


SCOTT SALSBURY (0039287)
POOJA ALAG BIRD (0078020)
SALSBURY & SALSBURY, LPA
75 Milford Drive, Suite 209
Hudson, Ohio 44236
Phone: 330 655-5760
Fax: 330 655-0526
ssalsbury@salsburylaw.com
pbird@salsburylaw.com

Counsel for Respondent JAG Healthcare, Inc.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was served upon the following, by electronic filing, email and regular U.S. Mail, this 10th day of August 2012:

National Labor Relations Board
Office of the Executive Secretary
1099 14th Street, N.W.
Washington, D.C. 20570

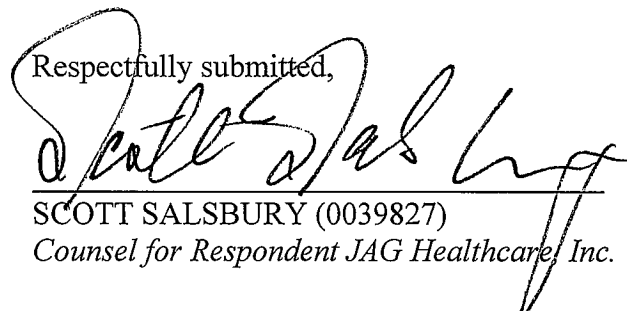
Frederick Caletrello
Regional Director, NLRB Region 8
1240 East 9th Street, Room 1695
Cleveland, Ohio 44119-2086

NLRB Division of Judges
Suite 5400 East
1099 14th Street, N.W.
Washington, D.C. 20570

Greg Gleine
Counsel for the Acting General Counsel
1240 East 9th Street, Room 1695
Cleveland, Ohio 44119-2086

Frank Hornick
Healthcare Coordinator
SEIU District 1199
1395 Dublin Road
Columbus, Ohio 43215-1086

Sheronda Johnson
Administrative Organizer
SEIU District 1199
1395 Dublin Road
Columbus, Ohio 43215-1086

Respectfully submitted,

SCOTT SALSBURY (0039827)
Counsel for Respondent JAG Healthcare, Inc.